IN THE UNITED STATES DISTRICT COURT FOR THE MIDDLE DISTRICT OF ALABAMA **SOUTHERN DIVISION**

PRECISION CPAP, INC., et al,

Plaintiffs

VS.

JACKSON HOSPITAL, et al,

Defendants

DEFENDANT MED-SOUTH, INC.'S INITIAL RULE 26(a)(1) DISCLOSURES

Comes now Defendant Med-South, Inc. and pursuant to Fed. R. Civ. P. 26(a)(1), by and through its attorney, respectfully submits the following initial disclosures:

Identity of Persons Likely to Have Discoverable Information To Α. **Support Defenses.**

Response: William C. Merrick and Stewart H. Pace, both Senior Vice-Presidents of Med-South, Inc. These individuals may be contacted through undersigned counsel.

Description of Documents in Defendant's Control That May B. **Support Defenses in this Case.**

Response: Defendant Med-South, Inc. has made an initial determination that it does not have within its possession records pertaining to this case. Defendant Med-South will supplement this response if new information becomes available.

C. **Computation of Damages.**

Response: None.

Available Insurance That May be Available in this Matter. D.

Response: None.

Respectfully submitted this 6th day of April, 2006.

_/s/ William T. Carlson, Jr. William T. Carlson, Jr. (ASB-5825-A62W) Attorney for Defendant Med-South, Inc.

Of Counsel:

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CERTIFICATE OF SERVICE

I hereby certify that on this the 6th day of April, 2006, I electronically filed the foregoing with the Clerk of the Court using the CM/ECF system which will send notice of such filing to the following:

> Mr. Brian M. Clark Wiggins, Childs, Quinn & Pantazis 301 Nineteenth Street, North Birmingham, Alabama 35203

Mr. Dwayne L. Brown P.O. Box 230205 Montgomery, Alabama 36123

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Mr. Dennis R. Bailey Ruston, Stakely, Johnston & Garrett 184 Commerce Street Montgomery, Alabama 36101

> /s/ William T. Carlson, Jr. William T. Carlson, Jr. Of Counsel